

Message

From: Beeler, Cindy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9B11E688258C462BAB293A6DF8FF4B27-BEELER, CYNTHIA]
Sent: 6/20/2019 9:02:33 PM
To: Garvey, Megan [garvey.megan@epa.gov]
Subject: FW: Options Selection for Oil and Natural Gas NSPS Technical Reconsideration (Tier 2, SAN 5719.8)
Attachments: NSPS OOOOa OS-technical6.21.19.docx

Importance: High

Megan –

Below is what I sent to our R8 management for the Option Selection call tomorrow.

Ex. 5 Deliberative Process (DP)

Let me know if you've questions,

Cindy Beeler

US EPA Region 8

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From: Beeler, Cindy
Sent: Thursday, June 20, 2019 11:03 AM
To: Thomas, Deb <thomas.debrah@epa.gov>
Cc: Patefield, Scott <Patefield.Scott@epa.gov>; 'Monica Morales' <Morales.Monica@epa.gov>
Subject: RE: Options Selection for Oil and Natural Gas NSPS Technical Reconsideration (Tier 2, SAN 5719.8)
Importance: High

The NSPS OOOOa Options Selection (Technical package for going to Final) has been moved again as you will have seen from the calendar invitation from Wehrum's office. It is tomorrow, Fri 6/21 at 10am MT. I am off, but will join the call from home.

OAQPS rule team did a pre-Options selection meeting privately with Wehrum yesterday. Attached is the (likely) final Option Selection paper.

If provided the opportunity to weigh-in during the call, here are some key points:

Ex. 5 Deliberative Process (DP)

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Who from R8 can state these recommendations if provided the opportunity?

Cindy Beeler

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-----Original Appointment-----

From: Beeler, Cindy

Sent: Tuesday, June 18, 2019 8:53 AM

To: Thomas, Deb

Cc: Patefield, Scott; Monica Morales

Subject: Options Selection for Oil and Natural Gas NSPS Technical Reconsideration (Tier 2, SAN 5719.8)

When: Friday, June 21, 2019 8:00 AM-9:00 AM (UTC-07:00) Mountain Time (US & Canada).

Where:

Deb –

This meeting has moved around quite a bit – I think this date (Fri, 6/21 at 8am MT) is the current scheduled time for Options Selection briefing with Wehrum on the “technical package” portion of NSPS OOOOa revisions. I have Friday, 6/21 off but can sit in on the call from home.

OAQPS is still working on management review of the materials for Options Selection but is sharing the attached **draft** that their management is reviewing. OAQPS is still reviewing the information in the materials and this will likely be updated before Friday.

Let me know if you have any specific questions.

***** Further Background *****

Deb –

The national workgroup has not received a copy of the briefing document that is to be used for Options Selection with Bill Wehrum. I will forward it to you once I receive it. I have Friday, 6/21 off but can sit in on the call from home.

FYI, here is the status of the revisions to NSPS OOOOa:

REGULATORY REVISIONS TO NSPS OOOOA
Status 6/10/19

The regulatory revisions to 2016 NSPS OOOOa are occurring in two packages:

Ex. 5 Deliberative Process (DP)

Status & Next Steps of Technical Package

- Option Selection on Final rule – scheduled for Fri, 6/14/19.
- R8 sent in FAR for the proposed rule as ‘concur-with-comments’ on 4/18/18.
- Proposed rule published 10/15/18. Public comments closed 12/17/18.

Ex. 5 Deliberative Process (DP)

- OAQPS is currently preparing Options Selection briefing material for Division Director and ultimately for Wehrum for the final rule. Current schedule:
 - FAR - June/July 2019
 - OMB Review – July 2019
 - Final Package for signature – August 30, 2019
- R8 has agreed to the following requested expediting and waivers of the ADP process during this rulemaking:
 - Down-tier SAN 5719.8 from Tier 1 to Tier 2 (R8 sent 12/11/17 recommending Tier2 rather than down to Tier 3 – this will now be a Tier 2)
 - Waive Analytic Blue Print on SAN 5719.8 (R8 sent 1/4/18)
 - Waive Early Guidance on SAN 5719.8 (R8 sent 1/24/18)
 - Expedite FAR on proposed SAN 5719.8 (R8 sent 2/7/18)
 - Waive Analytic Blueprint as the technical package goes final (R8 sent 5/13/19)

Status & Next Steps of Policy Package

- R8 sent in FAR for the proposed rule as ‘concur-with-comments’ on 4/16/19.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

- Following verbal direction from Bill Wehrum, a senior policy advisor drafted a new executive summary for the preamble to ensure messaging is correct and the legal rationale to ensure they are complementary (OGC involved too).
- On 5/30/19 OAQPS began routing the proposed rule through OAR – then to OP (typically ~2 weeks) – then to OMB.
- R8 has agreed to the following requested expediting and waivers of the ADP process during this rulemaking:
 - Waive Analytic Blue Print on SAN 6616 (R8 sent 1/29/18)
 - Expedite FAR on proposed SAN 6616 (R8 sent 5/7/18)

Other

- CTGs (Control Techniques Guidelines)
 - On 3/1/18 the EPA signed a notice seeking public comment on withdrawing the 2016 Control Techniques Guidelines for the Oil and Natural Gas Industry (Oil and Gas CTG).
 - **Ex. 5 Deliberative Process (DP)**
 - The comment period on the proposed CTG withdrawal closed 4/23/18 - EPA received over 90,000 comments.
 - The CTG supplemental proposal will follow the NSPS OOOOa SAN 6616 policy proposal to OMB (~Aug-Sep 2019).
 - The CTGs are a separate rulemaking from NSPS OOOOa and it does not have an inter-office technical workgroup.